

+AMENDED+, AMENDED TEXT

H.E. SULEIMAN AL SULAYMEM
MINISTER OF COMMERCE
MINISTRY OF COMMERCE
RIYADH
SAUDI ARABIA

YOUR EXCELLENCY,

AS IMPORTERS AND MANUFACTURERS OF CIGARETTES SOLD IN THE KINGDOM OF SAUDI ARABIA, WE UNDERSTAND THAT PURSUANT TO THE ARAB GULF STATES HEALTH MINISTERS' COUNCIL RESOLUTION NO. 4 OF JANUARY, 1986 THE CIGARETTE IMPORT SPECIFICATION, SASO 362/82, HAS BEEN AMENDED.

THIS SPECIFICATION FURTHER REDUCES TAR AND NICOTINE LEVELS AND CHANGES THE PLACEMENT AND EXPLANATION OF THE WARNING LABEL.

IT ALSO IMPOSES A TOTALLY NEW REQUIREMENT THAT THE MONTH ALONG WITH THE YEAR OF MANUFACTURE MUST APPEAR ON THE PACKAGE.



WE RESPECTFULLY EXPRESS OUR STRONG RESERVATIONS ABOUT THESE SIGNIFICANT POLICY CHANGES AND REQUEST THAT THESE IMPORTANT MATTERS BE REVIEWED PRIOR TO THE DATE WHEN THEY WILL BECOME EFFECTIVE.

WITH REFERENCE TO THE PROVISION IN THE SPECIFICATION REQUIRING THE MONTH OF MANUFACTURE ON THE PACKAGE, WE ARE CONCERNED ABOUT THIS POLICY DECLARATION WHICH PLACES CIGARETTE PRODUCTS IN THE SAME CATEGORY AS PERISHABLE FOOD PRODUCTS. THIS WILL CONFUSE CONSUMERS AND CAUSE BUSINESS PROBLEMS FOR US AND THOUSANDS OF SMALL TRADERS IN THE KINGDOM. TOBACCO PRODUCTS ARE NOT AT ALL SIMILAR TO FOOD PRODUCTS WHICH CAN SPOIL QUICKLY AND BECOME UNFIT FOR HUMAN CONSUMPTION. IN ADDITION, NO OTHER GOVERNMENT HAS IMPOSED SUCH A LABELING REQUIREMENT ON TOBACCO PRODUCTS.

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WITH REGARD TO THE AMENDMENT IN THE SPECIFICATION WHICH WILL CAUSE A SUDDEN, SHARP REDUCTION IN THE MAXIMUM TAR AND NICOTINE LEVELS, IT IS SUGGESTED IN THE SCIENTIFIC LITERATURE THAT SUCH A POLICY CAN CAUSE A RADICAL CHANGE IN THE WAY SOME INDIVIDUALS SMOKE THAT WOULD NOT BE ACCEPTABLE TO PROPONENTS OF THIS POLICY. FOR EXAMPLE, SMOKERS CAN TAKE MORE PUFFS, INHALE MORE DEEPLY, SMOKE MORE CIGARETTES OR EVEN RIP OFF THE FILTER BEFORE SMOKING THE CIGARETTE.

SOME SMOKERS WILL SEEK TO OBTAIN THEIR PREFERRED PRODUCTS FROM COUNTRIES WHICH DO NOT IMPOSE SUCH LIMITATIONS. ONLY EGYPT AND FINLAND IMPOSE SUCH LEGAL LIMITS AND THEIR REQUIREMENTS ARE NOT SO SEVERE AS THOSE IN THE GCC MEMBER STATES.

THE CIGARETTE MANUFACTURING TECHNOLOGY BY WHICH SUCH TAR AND NICOTINE REDUCTIONS ARE ACHIEVED AND MAINTAINED WITH HIGH QUALITY PRODUCTION CONTROLS IS NOT COMMONLY USED THROUGHOUT THE TOBACCO INDUSTRY. FOR EXAMPLE, OVER ONE HALF OF THE TOBACCO PRODUCTS MANUFACTURED IN THE WORLD EACH YEAR ARE PRODUCED BY COMPANIES OWNED AND OPERATED BY GOVERNMENTS. A SIGNIFICANT NUMBER OF THESE GOVERNMENT OWNED COMPANIES WILL EXPERIENCE GREAT DIFFICULTY IN EXPORTING PRODUCTS WHICH COMPLY WITH THESE MAXIMUM TAR AND NICOTINE LEVELS. THIS RAISES IMPORTANT TRADE QUESTIONS.

THE SECOND PAGE OF THE ENGLISH TEXT SHOULD REMAIN AS APPROVED.

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